

**UMOH LAW FIRM, PLLC**

25 BOND STREET, 2<sup>ND</sup> FLOOR,  
BROOKLYN, N.Y. 11201

TEL: 718.360.0527

EMAIL: [numoh@umohlaw.com](mailto:numoh@umohlaw.com)

FAX: 800.516.5929

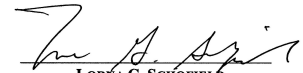
By ECF

June 26, 2020

Honorable Lorna G. Schofield, U.S.D.J.  
United States District Court—SDNY  
500 Pearl Street  
New York, NY 10007

Plaintiff's deadline to respond to Defendants' pre-motion letter is adjourned *sine die*. Plaintiff shall file the motion to remand today, **June 29, 2020**. Per Individual Rule III.B.4, any opposition or reply memoranda of law shall be filed in accordance with Local Rule 6.1. The parties are reminded that, per the Order at Dkt. No. 6, the initial pretrial conference is scheduled for **July 16, 2020**, and pre-conference materials are due **July 9, 2020**. So Ordered.

Dated: June 29, 2020  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re:

Rachel Hager v. Jay Steele, et al

20-CV-4482 (LGS)

Your Honor:

I represent the plaintiff Rachel Hager in the above-entitled action, and write in response to the defendants' June 18, 2020 advising the court of their intention to file a motion to dismiss.

This case was removed to this court on June 11, 2020. The defendants allege that the parties are diverse and the amount in controversy exceeds \$75,000. However, the facts support a finding that this court lacks jurisdiction and defendants have not met their burden of establishing diversity jurisdiction.

The issue of subject matter jurisdiction is a threshold issue that, in the undersigned's opinion, should be decided before the parties brief a motion to dismiss. Plaintiff respectfully requests this court stay any motions to dismiss until a decision on plaintiff's motion to remand has been decided. Plaintiff will file a motion to remand this matter to state court on or before June 29, 2020.

I thank the Court for your time and consideration of this matter.

Respectfully,

s/  
NKEREUWEM UMOH

Cc: Counsel for defendant via ECF.